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Attorneys for Defendant
TEXAS ROADHOUSE MANAGEMENT CORP.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

SONIA RAMIREZ, an Individual,

Plaintiff,

v.

TEXAS ROADHOUSE LLC., a Domestic
Limited-Liability Company; JOSE ANGEL
ARRIOLA, an Individual, DOES 1 Through
25, inclusive; and ROE CORPORATIONS 1
through 25, inclusive,

Defendants.

Case No. 2:23-cv-01718-JAD-NJK

**STIPULATION AND ORDER TO
DISMISS ENTIRE ACTION WITH
PREJUDICE**

ECF No. 23

Plaintiff SONIA RAMIREZ and Defendant TEXAS ROADHOUSE MANAGEMENT CORP. (incorrectly identified as TEXAS ROADHOUSE LLC), by and through their respective counsel of record, hereby stipulate and respectfully request an order dismissing the entire action with prejudice.¹

The parties agree that no party to this stipulation shall be deemed to be a prevailing party in this action and that no party will file for an award of attorneys' fees or costs pursuant to any rule, statute, or law, whether local, state, or federal, in any forum that would be available for the claims dismissed by this stipulation.

¹ Defendant Jose Angel Arriola has not appeared in the case. See ECF No. 18 Plaintiff's Motion for Entry of Clerk's Default.

Each party shall bear its own costs and fees for the claims dismissed by this Stipulation and Order.

Pursuant to the Court's February 13, 2024 Order, the parties further request that the telephonic status conference schedule for March 27, 2024 be vacated. See ECF No. 22 ("If dismissal papers are lodged with the Court by or before this date, the telephonic status hearing will be automatically vacated.").

Dated: March 22, 2024

Respectfully submitted,

/s/ Christian Z. Smith

Patrick W. Kang, Esq.
Kyle R. Tatum, Esq.
Christian Z. Smith, Esq.
Paul H. Wolfram, Esq.
KANG & ASSOCIATES, PLLC

Attorneys for Plaintiff
SONIA RAMIREZ

Respectfully submitted,

/s/ Diana G. Dickinson

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TEXAS ROADHOUSE MANAGEMENT
CORP.

ORDER

Based on the parties' stipulation [ECF No. 23] and good cause appearing, IT IS HEREBY ORDERED that THIS ACTION IS DISMISSED with prejudice, each side to bear its own fees and costs. The Clerk of Court is directed to CLOSE THIS CASE.



U.S. District Judge Jennifer A. Dorsey
March 26, 2024